

Shane J. Shumway (USB #13357)
JONES, WALDO, HOLBROOK & McDONOUGH
170 South Main Street, Suite 1500
Salt Lake City, Utah 84101
Telephone: (801) 521-3200
Fax: (801) 328-0537
sshumway@joneswaldo.com

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

JESSE ANNE MAJORS

Plaintiff,

v.

THOMAS JEFFERSON SCHOOL OF
LAW, et al.

Defendants.

:
:
: **REPLY TO DEFENDANT’S**
: **OBJECTION TO MOTION TO**
: **WITHDRAW AS COUNSEL**
:
:
: Civil No. 2:11CV00558 CW
:
: Judge Clark Waddoups
:
: Magistrate Samuel Alba

Shane J. Shumway and the law firm of Jones Waldo Holbrook & McDonough P.C.
 (“Jones Waldo”) hereby respond to Defendant’s Objection to Motion to Withdraw as Counsel.

Defendant misconstrues the reasons for Jones Waldo’s Motion to Withdraw. Strangely,
Defendant’s now enumerated concerns were absent from his request that the Court deny Ms.
Majors’ motion for appointment of counsel. (*See* Ct. Docket #11). The reasons suggested in
Defendant’s objection for Jones Waldo’s withdrawal are not the reasons Jones Waldo’s seeks to
withdraw from this case. Contrary to Defendant’s assertions, Jones Waldo is not opposed to
representing clients *pro bono* and is not seeking to withdraw as a consequence of a disbelief “in

Plaintiff's cause." Suffice it to say, notwithstanding that Jones Waldo cannot disclose attorney-client privileged information to support its motion, Jones Waldo's motion fully comports with all applicable rules and law. Undersigned counsel here affirms, as an officer of the Court, that Jones Waldo's actions and reasons for moving to withdraw fully comport with both DUCivR 83-1.4 and the provisions of Rule 6.2 of the Utah Rules of Professional Conduct. Counsel respectfully requests that if the Court needs additional information aside from the reasons set forth in Counsel's initial motion, an *in camera* review be conducted by the Court.

Dated this 28th day of September, 2011.

JONES WALDO HOLBROOK & McDONOUGH PC

By: /s/ Shane J. Shumway

Shane J. Shumway

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of September, 2011, I caused to be served, via the Court's ECF system, the foregoing **REPLY TO DEFENDANT'S OBJECTION TO MOTION TO WITHDRAW AS COUNSEL** to the following:

Robert H. Wilde
Bruce M. Franson
Robert H. Wilde, Attorney at Law, P.C.
935 East South Union Avenue, Suite D-102
Midvale, Utah 84047

/s/ Shane J. Shumway